

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

OLIVIA Y., *et al.*

PLAINTIFFS

v.

CIVIL ACTION NO. 3:04CV251LN.

HALEY BARBOUR, as Governor of the State of Mississippi, *et al.* DEFENDANTS

DECLARATION OF SARA ROBINSON-GLASSER

Sara Robinson-Glasser, an attorney of record in this civil action, makes this declaration under penalty of perjury and pursuant to 28 U.S.C. § 1746

1. I am a member of the Bars of Oregon, California and Florida and I am admitted to practice in this Court *pro hac vice*. I am co-counsel for the Plaintiff Class in this case along with local counsel, I give this Declaration in support of Plaintiffs' Memorandum In Support Of Plaintiffs' Motion For Award Of Class Counsel's Fees And Expenses.

2. As demonstrated by my resume, submitted as Attachment A to this Declaration and incorporated in this Declaration, I graduated *cum laude* from the University of Miami School of Law in 1983. From 1983 to 1989, I worked as a litigation associate, concentrating in civil litigation and commercial disputes. In 1989, I became an Assistant United States Attorney in the Central District of California. I was lead counsel in over twenty jury and non-jury trials, have briefed and argued more than fifteen appeals in the Court of Appeals for the Ninth Circuit and have published opinions from the Ninth Circuit. I am a member of the bars of the Supreme Court of the United States, the states of Oregon, California and Florida, admitted to practice in the Courts of Appeals for the Ninth and Eleven Circuits, and the Districts Courts for the District of Oregon, the Central District of California and the Southern District of Florida. I am experienced

in all aspects of civil trial practice, including discovery, motion practice, and both jury and bench trials. In 2005, while at the U.S. Attorney's office, I was promoted to Senior Litigation Counsel. From 2010-2014, I was in private practice, and handled a variety of commercial litigation, civil rights, and family court cases. In 2014, I became a Senior Staff Attorney at A Better Childhood, which brings class action lawsuits in order to reform dysfunctional child welfare systems.

3. In addition to my litigation work, I have also served as a volunteer member of the U.S. District Court, Central District of California Panel of Neutrals from 2004-2008. I am the author of "United States v. Feld, Customs Searches of International In-Transit Air Cargo." 13 *Lawyer of the Americas*, 314 (1982).

4. I have worked on the *Olivia Y.* matter since 2014. In early 2015, I, along with co-counsel in this case, received information from the Monitor that the State was failing to achieve the agreed-to reforms and was even back-sliding on the few reforms it did achieve. In response, over the next two months, I helped draft and edited the 57-page Renewed Motion for Contempt, for an Evidentiary Hearing and for the Appointment of a Receiver. (Dkt. No. 623). I then drafted discovery requests in order to obtain necessary information that would be necessary to present at the contempt hearing. In response to these discovery requests, Defendants produced hundreds of electronic files, containing hundreds of pages of uncategorized documents, except in the broadest sense and at least some of which were non-responsive to the discovery requests. While the documents were bates stamped, they were not identified by a table of contents, nor was there any way to tell the contents of the documents without reading each one individually. Defendants also filed numerous discovery requests of their own. I took primary responsibility during this billing period for managing all discovery, a task which took a substantial number of hours due to the volume both of Defendants request for discovery and the volume of their provided discovery.

5. In anticipation of a hearing on the contempt motion, I also spent hours preparing to defend the depositions of several key witnesses. I made a conscious effort to avoid duplicative and unnecessary tasks in my preparation.

6. As a Senior Staff Attorney at A Better Childhood, I know that it was the consistent policy and business practice of all counsel and support staff on this case to maintain contemporaneous and specific records of all time, and for such records to be entered into an online database. As part of my daily practice, I entered my time as I worked on this case into the database contemporaneously with the work being done. Along with Marcia Robinson Lowry, I have reviewed the time database for accuracy, and attest these summaries are an accurate and reliable account of the work performed and the compensable expenses incurred by Plaintiffs' counsel and support staff in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25th day of March 2016 in San Diego County, California.


Sara Robinson-Glasser

ATTACHMENT A

SARA R. ROBINSON-GLASSER

1095 Hardscrabble Road, Chappaqua, New York, 10514
(541) 660-3763 (Mobile) • srglasser@abetterchildhood.org

PROFESSIONAL EXPERIENCE

2014–present Senior Staff Attorney, A Better Childhood, New York

- All aspects of U.S. District Court class action litigation focused on reformation of dysfunctional child welfare systems

2010-2014 Principal, Law Office of Sara R. Robinson-Glasser, Grants Pass, Oregon

- Private practice of law in the Oregon State Courts, including commercial litigation, civil rights and family law cases

1989-2010 Assistant United States Attorney – Central District of California, Los Angeles, California

- All aspects of federal civil practice and affirmative civil prosecutions; including discovery, litigation, jury and non-jury trials and federal appeals
- **2005-2010 Senior Litigation Counsel**

1983-1989 – litigation associate – Miami, Florida

- Cohen and Silver
- Haley, Sinagra & Perez
- Paul, Landy, Bailey & Harper
- Worked as a litigation and research attorney concentrating on civil litigation in commercial disputes
- Practiced in federal and state courts
- Handled increasingly more complex cases and litigation matters including discovery, deposition, all aspects of trial and appellate practice

EDUCATION

1981-1983 University of Miami School of Law, Coral Gables, Florida

- **Juris Doctor, Cum Laude**
- Articles and Comments editor, *Lawyer of the Americas*, University of Miami Inter-American Law Review
- Society of Wig and Robe Chair
- Moot Court Board Chair

1975-1980 University of Northern Colorado, Greeley, Colorado

- **Master of Arts, Cum Laude**

1963-1967 University of Miami, Coral Gables, Florida

- **Bachelor of Arts, Cum Laude**

ADDITIONAL PROFESSIONAL ACTIVITIES

**2004-2008 Volunteer member of U.S. District Court, Central District of California
Panel of Neutrals**

PUBLICATION

“United States v. Feld, Customs Searches of International In-Transit Air Cargo”

13 *Lawyer of the Americas*, 314 (1982)

BAR ADMISSIONS

Supreme Court of the United States

United States Court of Appeals, Eleventh Circuit

United States Court of Appeals, Ninth Circuit

United States District Court, District of Oregon (Medford, Oregon) – admitted to practice in Oregon, 2010

United States District Court, Central District of California (Los Angeles, California) – admitted to practice in California, 1989

United States District Court, Southern District of Florida (Miami, Florida) – admitted to practice in Florida, 1983